

I am in opposition to NPRM 04-140 as it is currently written. While I applaud the commission for taking action in redoing part 97 and approving of the ARRL's motion it does not take into consideration the current ARRL petition (RM10867) on License restructuring or the fact that the WRC last year did away with the Morse code requirement for operation below 30 MHz.. Article 25 now leaves it up to the individual administrations to decide whether Morse code is required. I recommend that this NPRM be revised, rewritten or put on hold until the current ARRL petition (RM10867) on license restructuring is considered.

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